ADEM

ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

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Environmental Scientist, Senior
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Sejong Alabama, LLC
450 East Old Fort Road
Fort Deposit, Lowndes County, Alabama 36032

EPA ID Number: ALR00005810
NAICS Code: 336399
Telephone: (334) 227-0821

3) Responsible Officials

Blake Miley, Environmental Health & Safety Manager - Sejong
Email: [HYPERLINK "mailto:bmiley@sjausa.com"]
Telephone: (706) 816-1502
Tanya Speir, Human Resources Manager – Sejong
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Telephone (334) 227 – 0821 Ext. 506

4) Inspection Participants

Ms. Tanya Speir
Mr. Dale Beach, Quality Manager – Sejong
Mr. Chris Kim, Plant Manager - Sejong
Ms. Paula Whiting, Environmental Engineer
US Environmental Protection Agency - Region IV
Ms. L. J. Knickerbocker

5) Date of Inspection

March 21. 2016

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations.

7) Purpose of Inspection

The purpose of the inspection was to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code.

8) Facility Description

Sejong Alabama LLC (hereinafter "Sejong") assembles exhaust systems as a Tier 1 supplier for Hyundai and Kia. The facility consists of a single assembly plant with five separate welding areas. Each welding area is served by its own baghouse. See Photograph #1 for an aerial view of the site.

In its most recent notification of regulated waste activity prior to the inspection (ADEM Form 8700-12, dated October 24, 2014) Sejong identified itself as a conditionally exempt small quantity generator of chromium sludge (EPA hazardous waste number D007), a small quantity handler of universal waste, and a used oil generator. Subsequent to the inspection, on March 22, 2016, Sejong identified itself as a small quantity generator of chromium waste (EPA hazardous waste number D007), a small quantity handler of universal waste, and a used oil generator.

9) Observations

On March 21, 2016, Ms. Whiting and I (hereinafter "we" or "us") arrived at the site at 1:15 p.m. and proceeded to the front lobby, where we met Ms. Speir and Mr. Beach. We introduced ourselves and explained the purpose of our visit. We proceeded to a conference room where we held the opening meeting and the facility representatives provided background information about the site and an overview of its operations.

The site was established in 2004; it has operated continuously since that time. It currently operates from sixteen to twenty hours per day, Monday through Friday; it runs two 8- or 10-hour shifts, depending on the demand from the vehicle assembly plants. It has one hundred sixty employees; of these, eight handle hazardous waste on a routine basis.

The largest wastestreams handled at the site are chromium-containing baghouse dust and spent baghouse filters; the dust is generated when stainless steel exhaust components are welded together. Additional wastestreams include: universal waste lamps and batteries; used oil; and paint-related waste, to include spent paint pens, waste paint and solvent, and residues drained from spent aerosol paint cans (EPA hazardous waste numbers D001, D035, F003, and F005).

During the past three years, hazardous wastes have been sent to EWS (EPA identification ALD981020894), in Glencoe, Alabama, Tradebe Treatment & Recycling of TN (EPA identification TND000772186), in Millington, Tennessee, and Safety-Kleen Systems, Inc. (EPA identification KYD053348108) of Smithfield, Kentucky. Used oil is collected by Smith Waste Oil (EPA identification ALR000043356). Universal Waste is sent to Environmental & Recycling Solutions (EPA identification ALR000044990), of Opelika, Alabama.

Following the opening meeting, Ms. Speir, and Mr. Beach accompanied us on a tour of the site, during which we conducted the walk-through inspection. Mr. Kim joined us about halfway through the site tour.

During the walk-through inspection, we noted the following:

Breezeway

The Breezeway (an enclosed passage that marks the separation point between the administrative offices and the production floor) is used to accumulate universal waste lamps and batteries, spent paint pens, and electronic devices pending removal from the site. We observed the following items:

- Four corrugated cardboard boxes holding spent universal waste (UW) fluorescent lamps;
- One corrugated cardboard box holding broken fluorescent lamps; it was closed, labeled with the

words "Hazardous Waste", and dated. The accumulation start date was September 1, 2015;
- One uncontained HID lamp;
- One unmarked 55-gallon drum holding three spent paint pens;
- Two 5-gallon plastic buckets holding UW batteries (one each of Ni-Cad and Lithium ion);
- One open cardboard box holding four UW lead-acid emergency lighting batteries;
- Seventeen spent fluorescent lamp ballasts; and
- Two unwanted microwave ovens.

The following noncompliant issues were noted in this area:

- The four boxes containing UW lamps were not marked or closed (the flaps were not closed or sealed);
- The uncontained HID lamp was placed on top of the box containing the broken lamps. It appeared to be intact, but was not marked in any way. Representatives of Sejong were not sure if this lamp was a waste (it was subsequently managed as UW);
- The drum that contained the spent paint pens was closed, but was not marked with the words "Hazardous Waste". The pens contain xylene and are disposed as an ignitable (D001) hazardous waste;
- The containers holding the UW Ni-Cad and Lithium ion batteries were both closed and marked appropriately, but were not dated;
- The UW lead-acid batteries were intact, but were not marked or dated;

In an email dated March 23, 2016, Mr. Blake Miley responded to the preliminary inspection form and indicated that all UW items had been properly contained, labeled and dated and that the markings on the drum holding the paint pens had been corrected.

The facility representatives were not able to demonstrate how they tracked the accumulation of any universal wastes; they were also not certain how they intended to manage the spent lamp ballasts or the microwave ovens. See Photograph #2 through Photograph #5.

Used Oil

Used oil is generated from various equipment maintenance activities conducted throughout the site. The oil is collected and brought to the Used Oil storage area, which consists of two 250-gallon totes staged over a secondary containment unit at the northeast corner of the facility. Both totes were in good condition, closed, and clearly marked with the words "Used Oil". No issues were noted in this area. See Photograph #6 and Photograph #7.

Bag Houses

Sejong has five baghouses that collect chromium-contaminated dust generated during the process of welding exhaust systems together. Each baghouse serves a specific production line.

The "LFA" unit, which services the Sonata line, is located near the north east corner of the building. It had two 55-gallon drums attached to the unit; one was full, while the other was about half filled. Both were marked with the words "Hazardous Waste" and were closed. The lid of the full drum appeared to be rusted. Neither container was dated.

The "UD" unit, which had serviced the Elantra line, is located near the mid-point of the east wall of the plant. This unit was shut down on December 14, 2015. Two full 55-gallon drums were still attached to the unit; both were marked with the words "Hazardous Waste" and were closed. They were not marked with dates the drums became full and had not been removed from the unit and placed into the hazardous waste storage area. One drum appeared to be significantly rusted. The "return air" duct was vented to the outside; per Mr. Kim and Ms. Speir, the air returned from the filtration unit was either too hot or too cold,

making it difficult to control the air temperature inside the plant.

The "WCC1" unit is located along the east wall of the plant between the "UD" unit and the "WCC2" unit. It services the engine line. There were two 55-gallon drums at this baghouse; one was about 75% full, while the other was about 25% full. Both were marked with the words "Hazardous Waste" and were closed, but the lids appeared to be significantly rusted. Neither container was marked with date the waste exceeded 55 gallons. Again, the "return air" duct was vented to the outside to make it easier to control the air temperature in the vicinity of the unit.

The "WCC2" unit is located near the south east corner of the building. It also services the engine line. Two full 55-gallon drums were attached to the unit. Both were in good condition, marked with the words "Hazardous Waste", and were closed. They were not marked with dates the drums became full.

The "Rework" baghouse is located near the center of the north wall of the plant and serves the rework area. It had two partially-filled 55-gallon drums attached. Both were closed and in good condition. One was marked with the words "Hazardous Waste", while the other was not marked or labeled.

See Photograph #8 through Photograph #15.

In an email dated March 23, 2016, Mr. Blake Miley responded to the preliminary inspection form and indicated that all full containers were moved to hazardous waste storage, the rusted containers and lids have been replaced, lids that shed water have been ordered, and all drums have been correctly labeled.

Maintenance Area, Mechanical Room/Chemical Storage Area

In the Maintenance Area, located near the Breezeway, facility employees maintain and repair site equipment. Used oil-saturated sorbents, paint related waste, and spent aerosol paint cans are generated during maintenance and repair activities. There was one parts washer unit in the Maintenance Area; per Mr. Beach, it is maintained by Safety-Kleen. There was also a corrugated cardboard box of UW lamps stored in the Maintenance Area. The box was not closed, was not marked or labeled with any of the required phrases, and was not dated. As with other UW items, facility personnel were not able to document when the lamps became waste or how long they had been accumulated.

Employees puncture aerosol cans, collect empty paint cans, and store oil-saturated sorbents in the Mechanical Room/Chemical Storage Area adjacent to the Maintenance Area,. The following units were staged there:

- One 55-gallon drum equipped with an aerosol can puncture device;
- One open hopper holding empty paint cans and punctured aerosol cans; and
- One 55-gallon drum of oil-saturated spent sorbents.

The drum equipped with the aerosol puncture unit was closed, labeled with the words "Hazardous Waste", and appeared to be in good condition. Above the hopper holding the empty paint cans and aerosol cans, there was a sign reading "Aerosol Universal Waste". The drum holding the oil-saturated material was closed and in good condition, but was not marked with the words "Used Oil". Instead, it was labeled with the words "Oily Hazardous Waste".

See Photograph #16 through Photograph #20.

In an email dated March 23, 2016, Mr. Blake Miley provided documentation showing that the box of UW lamps had been closed, marked, and dated.

Records Review

Based on Sejong's reported status (conditionally exempt small quantity generator), we requested the following documents and records:

- Hazardous waste determinations
- Documentation of the quantity of hazardous waste generated each month
- Waste profiles
- Hazardous waste manifests, if used
- Land disposal restriction forms

The following records were not available for review:

- Documentation of the quantity of hazardous waste generated each month
- Waste profiles for the wastes that are disposed in Alabama
- Land disposal restriction notices

Sejong was able to provide hazardous waste determinations for all wastes generated at the site and some of the manifests for shipments of hazardous and universal waste; the remaining manifests were provided via email on March 29, 2016. The paint and solvent waste carried EPA hazardous waste numbers D001, D035, F003, and F005. The chromium-containing baghouse dust and filters carry EPA hazardous waste number D007.

Facility representatives could not provide documentation of the quantity of hazardous waste generated each month, but based on a review of the hazardous waste manifests that were provided subsequent to the inspection, Sejong appears to be either a small quantity or large quantity generator. Sejong has shipped more than 2,200 pounds of hazardous waste off-site twice since July of 2014. On July 2, 2014, the site shipped off 680 pounds of hazardous waste (paint related materials). On August 21, 2014, which was the next hazardous waste shipment, 2,350 pounds of chromium-containing dust was sent off-site. On May 22, 2015, 110 pounds of the chromium-containing dust was sent off-site. On June 2, 2015, which was the next hazardous waste shipment, another 7,025 pounds of that same waste was shipped. No waste has been shipped off-site since June 2, 2015.

Sejong has not provided any form of training to its employees.

10) Summary

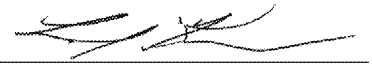
The following potential areas of noncompliance were noted at the time of the inspection:

- Sejong could not provide documentation of the quantity of hazardous waste generated each month.
- Sejong has shipped more than 2,200 pounds of hazardous waste off-site at least twice since July of 2014; the most recent shipment occurred on July 2, 2015.
- Sejong did not notify the Department of its regulated waste activity between October 24, 2014 and March 22, 2016.
- Sejong did not include the EPA hazardous Waste Numbers for all wastes generated at the site its most recent notification.
- Sejong did not provide all requested documentation during the inspection.
- Sejong did not provide training to its workers that handle hazardous waste.
- Sejong did not mark five containers holding UW lamps and four UW batteries with one of the required phrases.
- Sejong did not close five boxes containing UW lamps.
- Sejong did not have a method in place to document the length of time it accumulated UW at the facility. None of the materials identified as UW were dated and facility representatives were not able to demonstrate any other method used to document how long UW was accumulated at the site.
- Sejong accumulated one box containing hazardous waste fluorescent lamps since September 1, 2015, a total of 203 days.

- Sejong did not remove filled containers from satellite accumulation areas within three days of the date they became full. Sejong left two filled satellite accumulation containers of chromium-containing dust in place at the UD baghouse from the time that unit was deactivated on December 14, 2015, a total of ninety-nine days.
- Sejong did not place a date on each satellite accumulation container once the volume exceeded 55 gallons. At each of the five baghouses, there were two drums accumulating waste. In each case, at least 55 gallons of waste was present, yet none of the containers were marked with accumulation start dates.
- Sejong did not store hazardous waste in containers that were in good condition. Four of the drums associated with the baghouses were rusted or had rusted lids.
- Sejong did not mark all satellite accumulation containers holding hazardous waste with the words "Hazardous Waste". One 55-gallon drum holding chromium dust and one 55-gallon drum holding spent paint pens were not marked in any way.
- Sejong did not mark one 55-gallon open-top drum holding oil-saturated sorbents with the words "Used Oil". Instead, it was labeled with the words "Oily Hazardous Waste".

Following the inspection, we met with the facility representatives for a closing meeting. We reviewed our observations, and gave them the opportunity to ask questions. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report* that addressed the areas of potential noncompliance noted during the inspection. We left the top copy of the form and several guidance documents with facility personnel and departed the site at 5:00 p.m.

11) **Signed**



Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

April 15, 2016
Date

12) **Concurrence**

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

April XX, 2016
Date

Attachment - Photo Log

35454 ALR000058180 085 20160415 HWTM

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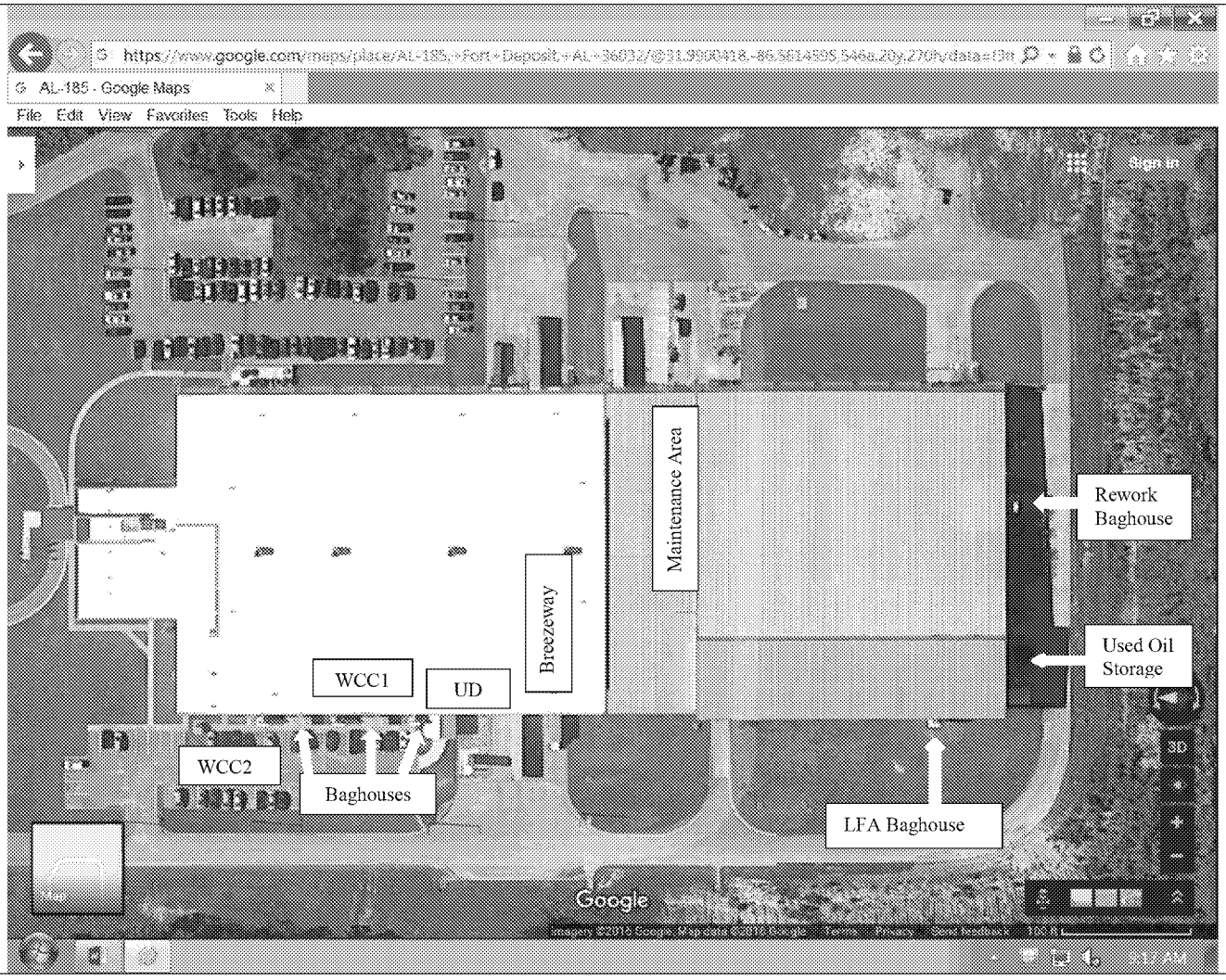
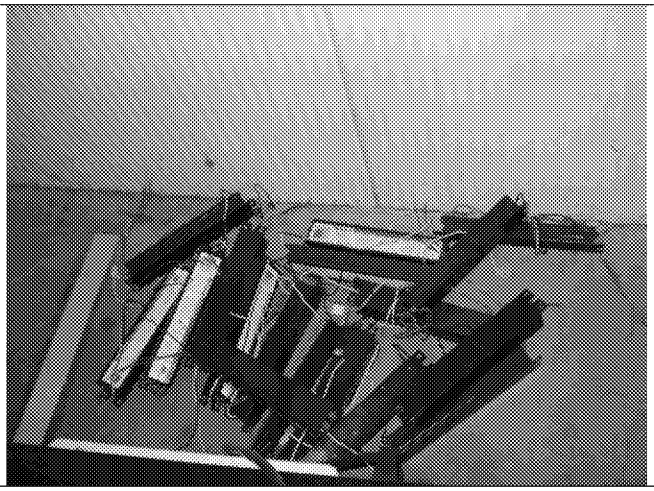
ATTACHMENT – SEJONG ALABAMA LLC PHOTO LOG



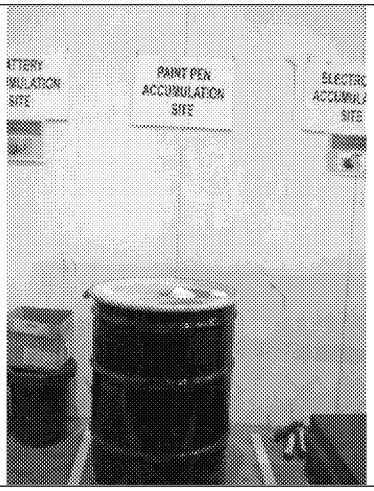
1. Google Maps view of site

2. Universal waste lamps, including one not contained

3. Universal waste lead-acid batteries

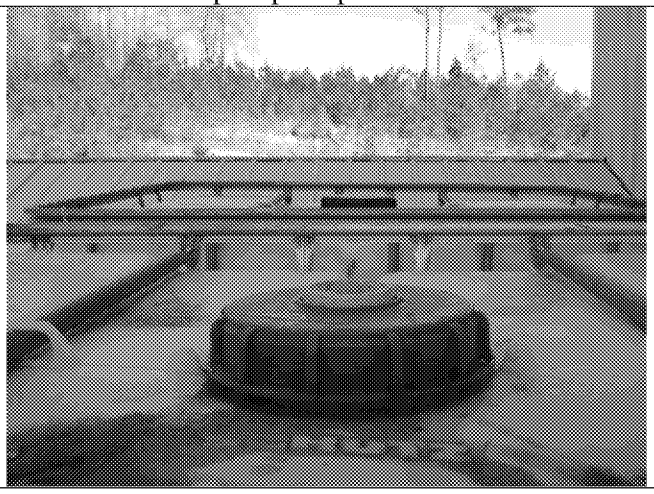


4. Spent electronic ballasts



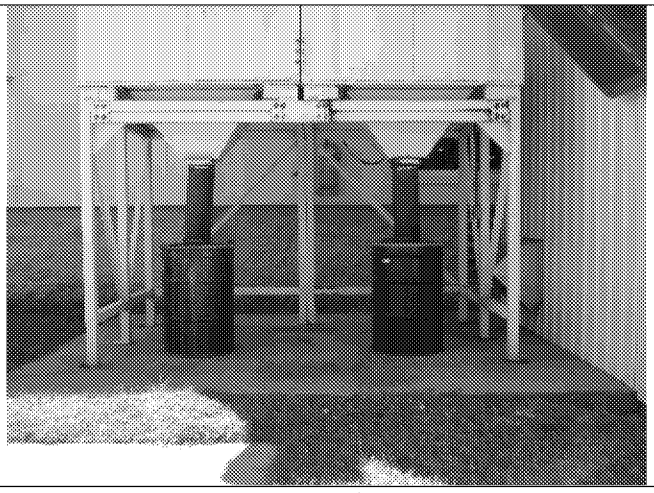
5. Spent paint pens – D001

6. Used Oil storage area

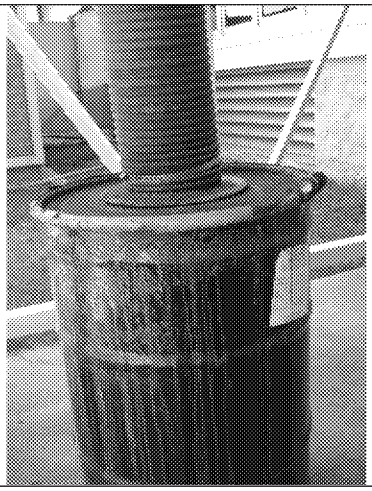


7. UO totes - closed

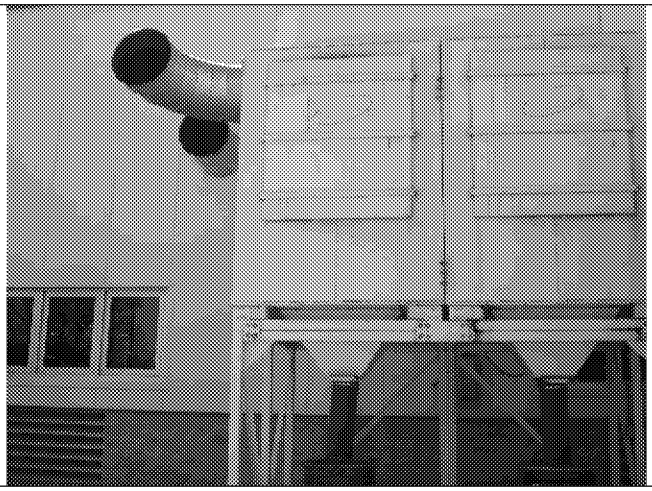
8. LFA Baghouse



9. UD Baghouse

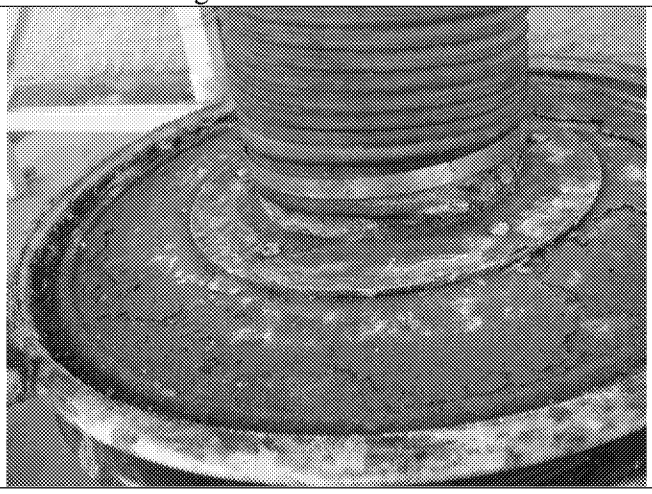


10. UD Baghouse – Rusted drum



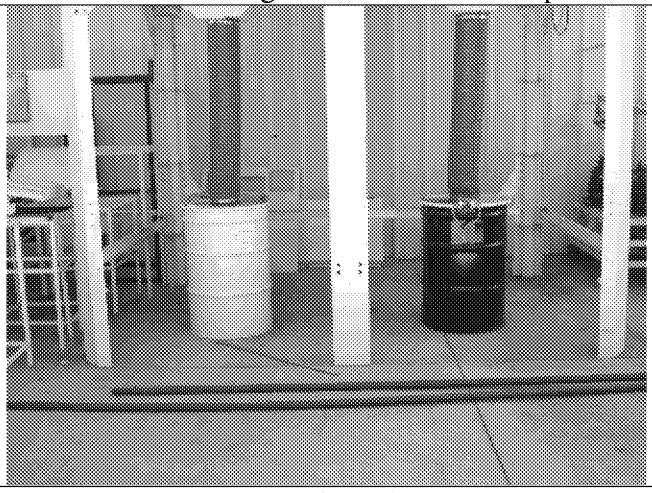
11. UD Baghouse – Return air disconnected

12. WCC1 Baghouse



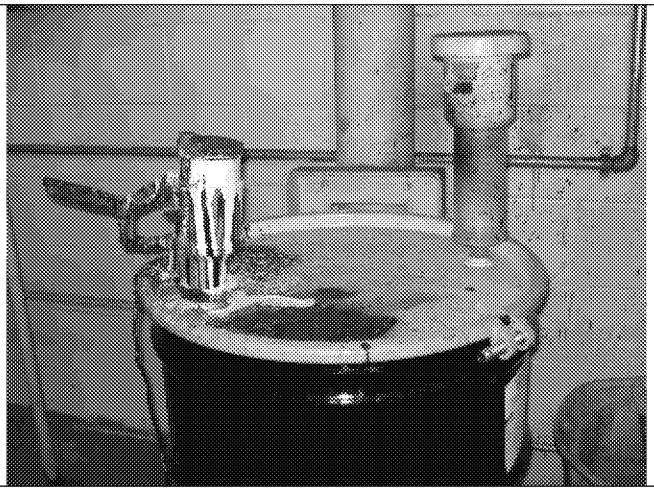
13. WCC1 Baghouse – rusted drum top

14. WCC2 Baghouse



15. Rework Baghouse

16. Maintenance Shop - Universal Waste lamps



17. Mechanical Room/Chemical Storage Area - Aerosol can puncture unit

18. Mechanical Room/Chemical Storage Area - Aerosol puncture unit label

19. Mechanical Room/Chemical Storage Area – Paint cans and spent aerosol cans

20. Mechanical Room/Chemical Storage Area - Oil saturated sorbents